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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$19,820.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:20-MC-00322-TLN-KJN

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant William
18 Schulz ("claimant"), by and through their respective counsel, as follows:

19 1. On or about September 29, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service with respect to the Approximately \$19,820.00
21 in U.S. Currency (hereafter "defendant currency"), which was seized on or about July 22, 2020.

22 2. The United States Postal Inspection Service has sent the written notice of intent to forfeit
23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person
24 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than
25 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture
26 proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency

1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
2 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
3 That deadline is December 28, 2020.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to January
5 27, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be required
9 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
10 the defendant currency is subject to forfeiture shall be extended to January 27, 2021.

11 Dated: 12/26/2020

McGREGOR W. SCOTT
United States Attorney

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13 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

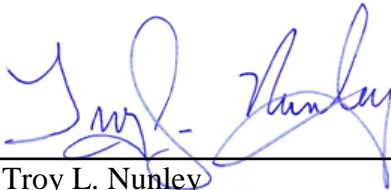
14
15
16 Dated: 12/26/2020

/s/ Richard Parker
RICHARD PARKER
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(Signature authorized by email)

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24 **IT IS SO ORDERED.**

25 Dated: December 28, 2020

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Troy L. Nunley
United States District Judge